

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORACLE CORPORATION,

Plaintiff,

v.

CHARTIS SPECIALTY INSURANCE
COMPANY,

Defendant.

Civil Action No. 1:18-cv-03440-GHW

**DECLARATION OF
DEBORAH HIRSCHORN**

Deborah Hirschorn, under penalty of perjury, declares as follows:

1. I am a Complex Claims Director of AIG Property Casualty, and am authorized to submit this declaration on behalf of AIG Specialty Insurance Company (f/k/a Chartis Specialty Insurance Company) ("AIGSIC") in opposition to plaintiff Oracle Corporation's motion, pursuant to Fed. R. Civ. P. 12(c), for partial judgment on the pleadings in this matter. I am fully familiar with the matters set forth herein.

2. Annexed hereto as Exhibit 1 is a true and correct copy of a letter dated June 16, 2015 from Joan N. D'Ambrosio of Clyde & Co. on behalf of Beazley, to Deborah Miller, Esq. of Oracle Corporation, as alleged generally in Paragraph 46 of the Complaint.

3. Exhibit 1 was received by AIG Property Casualty in the regular course of its business, and was maintained by it in the regular course of its business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 9, 2018.


Deborah Hirschorn